

**U.S. ENVIRONMENTAL PROTECTION AGENCY
PROGRESS POLLUTION REPORT**

I. HEADING

Date: December 17, 1993

From: Kevin Matheis/Jack Harmon, On-Scene-Coordinators,
USEPA, REGION II *Kevin Matheis*

To: W. Muszynski, EPA
K. Callahan, EPA
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G. Zachos, EPA
J. Rotola, EPA
ERD, Washington,
(E-Mail)
J. Marshall, EPA
M. Basile, EPA Niagara Falls
E. Schaaf, EPA
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D. Fischer, EPA
S. Becker, EPA
I. Purdy, EPA-HWFB
M. Jon, EPA-HWFB
M. O'Toole, NYSDEC
A. Rockmore, NYSDEC
F. Shattuck, NYSDEC IX
TAT

Subject: Frontier Chemical Processes, Inc., Niagara Falls,
Niagara County, NY - Cyanides, Oxidizers, Flam-
mables, Corrosives, Halogenated and
Non-Halogenated Solvents

POLREP NO: Fifteen (15)

II. BACKGROUND

SITE/SPILL NO.: AY
D.O. NO.: 0026-02-036
RESPONSE AUTHORITY: CERCLA/SARA
NPL STATUS: Non-NPL
START DATE: December 22, 1992
APPROVAL STATUS: Authorization of Funding from
Deputy Regional Administrator
STATUS OF ACTION MEMO: Signed May 17, 1993

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III. RESPONSE INFORMATION

A. Situation

1. See Polrep #1.

B. Actions Taken

1. The PRP contractor continues to stage, segregate and sample the approximately 4100 drums. To date, approximately 99% of the drums have been staged and sampled for field categorization. Composite samples of each drum load continue to be sent off-site for disposal analysis and TSDF acceptance.

Waste approvals continue to be received from the selected RCRA TSDFs, in particular APTUS, Southeastern Chemical, and Envotech (Michigan Disposal). The following RCRA TSDFs and their expected waste allocation from this project are listed as follows: Aptus - 35%, Southeastern Chemical - 7%, Envotech - 56%, and CyanoKem - 2%. On December 16th, one drum load was shipped to the Envotech facility for stabilization and landfilling. Six additional loads are expected to be shipped during 12/17 - 12/19. After the 12/19 shipment, 21% of the expected waste volume will have been shipped off-site for treatment and/or disposal.

The PRP technical committee representative has been providing oversight to ensure that work continues in accordance with the AOC. During the long shifts, OSC Ferriola and Matheis are providing comprehensive drum oversight and is ensuring that the PRPs are complying with the PRP work plan.

2. OSC Matheis is coordinating the continuing drum enforcement activities; processing formal and informal FOIA requests, assisting ORC with the processing of UAO recipients, managing numerous PRP requests for updates, and coordinating with the PRP designated coordinator. ORC is revising the caption pages on the Consent Order and Unilateral Orders so the current PRPs will be reflected.
3. OSC Harmon continues work on the tank PRPs with TAT. Numerous file boxes are being input into the tracking computer program, D-Base. To date, approximately 1,350 PRPs have been identified for the tanks on-site. TAT continues to compile the data from the final series of

the tanks and is expected to complete the tank PRP list by the end of December.

4. Consultants from the Pendelton Site, (a NYSDEC Site related to Frontier) are on-site to microfilm documents associated with wastes received at Frontier. These documents will be used to assist in future PRP allocations related to that site.
5. ETI was demobilized from the site on November 15. All subcontract services at the site have been assumed by OHM. OHM has decided that the rehire of the ex-Frontier maintenance employees, (now ETI employees) would be the most efficient way of managing the site.
6. ERCS continues to provide maintenance and conduct winterizing activities. Due to the freeze/thaw weather conditions, numerous steam pipes have ruptured; ERCS personnel has been promptly effecting repairs. During the week of November 29, heavy rainfall forced the maintenance personnel to pump approximately 50,000 gallons of water from the containment areas and buildings.

During the week of November 22, approval from Niagara Falls was received for the discharge of 100,000 gallons of water collected from the secondary containment on site. Discharge into the Niagara Falls POTW was completed on November 24.

7. The NYSDEC Region IX Division Director of Hazardous Substance Regulation and Assistant visited the site on November 10. The OSC gave the NYSDEC a comprehensive update regarding the status of the site. The NYSDEC has indicated that ENTECH, the potential buyer for the property has not yet submitted the required paperwork that is necessary for the facility transfer. The NYSDEC indicated they will send a letter requesting the submittal of these documents, so the NYSDEC can make a decision regarding the transfer. The NYSDEC indicated that the NY Attorney General has not yet acted on the status of the \$1.5M surety bond to be used towards the closure of the facility.

A representative from New York State Taxation and Finance Department was on-Site on December 1. The taxation agent was looking for the Frontier parent company, Enviroasure Management. Apparently, Enviroasure owes \$180,000 in sales tax revenue for 1992. The OSC gave the agent the address of the Chairman of the Board for Enviroasure.

A press event was held on December 15, EPD notified all pertinent media and elected officials. Representatives of the Niagara gazette, the PRP steering committee and ORC attended.

C. Future Actions

1. Maintenance of the facility and 24-hour security will continue.
2. The OSCs and TAT continue to compile PRPs for the forthcoming tank removal action. The PRP contractor will continue to sample and composite drums into there various waste stream. Removal of drums off-site to will commence following disposal facility approval. Movement of the drums off-site is not expected until early December.

D. Key Issues

1. As part of the negotiated AOC, EPA will continue to provide maintenance support to the PRP contractor.
2. EPA continues to process information requests as PRPs telephone requests, and mail FOIA requests to the EPA-OSC.

IV. COST INFORMATION:

	Obligations	ETI Region II Contract Costs As of 11/03/93	Total Remaining
Obligated to DCN#932AKE0004, DCN#932AKE0010, DCN#932AKE0031	\$ 900,000		
Amount Deobligated DCN#932AKE0031	\$ -50,000		
Amount Deobligated DCN#932AKE0031	\$ -65,000		
TOTAL	\$ 785,000	\$ 775,000	\$ 10,000

		ETI Region III Contract costs as of 11/03/93	
Amount Obligated to Present Contract DCN#932AKE0068	\$ 350,000	\$ 325,000	\$ 25,000
EPA/TAT Costs	\$ 632,000	\$ 300,000	\$ 332,000
Site Totals	\$ 1,767,000	\$ 1,400,000	\$ 367,000